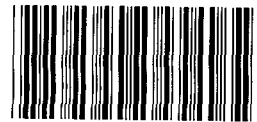


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SF FILE NUMBER

August 10, 1992

To: Troy Sanders  
Ecology and Environmental

From: Ron Hall  
Boyles Bros. Drilling

Re: Park City Landfill Project

FILE PLAN

2.0

After review of Pioneer Technical Services, Inc. report on well installation at United Park City Mines Landfill we offer the following information as it pertains to our involvement.

Page 11-Item #A1 - Our driller Mr. Tom Giles does not agree with this statement. All pipe and tools were decontaminated at the location of the previous job and again steam cleaned at our shop facilities and also before being used on site for hole #MW-1. He did say that there was a small amount of Hydraulic oil on two pieces of casing but were in fact cleaned on site before use. All drilling equipment was clean.

Page 11-Item #A2 - The bit used on MW-3 was in fact cleaned at the site before using. He remembers as Charlie (his helper) had to carry the bit & reamer from the de-con pad back to the hole. In addition his truck bed was and is not oil and diesel soaked.

Page 11-Item #A3 - Tom Giles has no specific remembrance of this statement but thought all pipe was rinsed after the acetone was applied.

Page 11-Item #A4 - The tape was a fiber glass tape. Tom claims it was in fact decontaminated between holes.

Page 12-Item #B - Our personnel disagree with this statement. Tom thought that they did wear gloves but not 100% sure. He is sure that their hands were not oily and dirty, as all the material was clean. The hardhat used to pour the sand into the casing (this is not our normal procedure but was done due to the height of the pipe) was brand new and taken it out of the protective wrapper.

Page 12-Item #C - The driller attempted to use a factory diverter head but due to the materials encountered this kept plugging up. I do agree that the plastic sheeting was probably not the best deflection method available.

Page 12-Item #IIIA1 - The portion of the hole drilled with the Odex hammer provides a hole approximately 6" in O.D., however the portion of the hole that was drilled using the tricone bit only allowed a 4" O.D. The drilling was very tough, encountering rocks, concrete, wood etc. making Auger methods unworkable.

Page 13-Item #IIIA2 - No comment

Page 13-Item #IIIA3 - Maybe we should have drilled this project different but the Park City area geology usually has us use the Odex method. The geology changes very rapidly in the area and is hard to determine the best method in advance. I do not know how the consultant knows the screen was installed directly against the formation or that the hole caved, I believe this to be his opinion only and it seems to be slightly biased. The driller told me he figured his sand pack volume for all three wells and it came close to what it should have taken, this would indicate that caving no occurred.

Page 13-Item #IIIA4 - The outer casing was pulled in different lifts, but the consultant fails to mention that the filter pack material was in the casing and the material flowed around the screen as the casing was pulled. The casing was not pulled higher than what was left inside the casing.

Page 14-Item #IIIB1 - The equipment before entering the hole was cleaned and not left on the ground.

Page 14-Item #IIIB2 - The driller's helper did smoke on site, which should not have occurred, but he did so approximately 40FT from the hole, near the compressor.

Page 14-Item #IIIB3 - Tom does not remember if bare hands were used while developing, if so this is not good practice. The rope was allowed to lie not on the ground but only on the newly poured concrete pad around the well.

Boyles Bros. in no way has an indifferent attitude toward the state or E.P.A. procedures for installation of wells, we take the guidelines very seriously and try to follow all procedures as correctly as possible. All work preformed was under the direction of Ecology and Environmental personnel. Our site personnel noted a negative attitude with the consultant concerning the placement of wells at this site.